

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF NORTH CAROLINA
WESTERN DIVISION
CASE NO. 5:21-cv-00008-BO

LENOVO (UNITED STATES) INC.,)
Plaintiff,)
v.)
LIBERTY PATENTS, LLC,)
Defendant.)

**JOINT MOTION TO DISMISS
WITH PREJUDICE**

COMES NOW plaintiff Lenovo (United States) Inc. (“Lenovo”) and defendant Liberty Patents LLC (“Liberty Patents”), pursuant to Rule 41(a)(1)(A)(ii), FED. R. CIV. P., and moves the Court for an order dismissing all claims brought by Lenovo with prejudice. Each side is to bear their own attorneys’ fees, costs, and expenses associated with this proceeding. A proposed order is being submitted herewith. Further, the undersigned confirms that the content of this document is acceptable to all persons required to sign the document and that all such persons have given their explicit consent for the filing attorney, Mr. Wharton, to affix his signature and submit the document electronically.

WHEREFORE, Lenovo and Liberty Patents respectfully request that the Court enter an order dismissing all claims in this matter with prejudice.

[SIGNATURE BLOCKS ON FOLLOWING PAGE]

This the 8th day of July, 2021.

/s/ Jacob S. Wharton

Hayden J. Silver III, NCSB No. 10037
Raymond M. Bennett, NCSB No. 36341
WOMBLE BOND DICKINSON (US) LLP
555 Fayetteville Street, Suite 1100
Raleigh, North Carolina 27601
Telephone: (919) 755-2188
Facsimile: (919) 755-6099
E-mail: Jay.Silver@wbd-us.com
Ray.Bennett@wbd-us.com

Jacob S. Wharton, NCSB No. 37421
WOMBLE BOND DICKINSON (US) LLP
One West 4th Street
Winston-Salem, North Carolina 27101
Telephone: (336) 747-6609
Facsimile: (336) 726-6985
E-mail: Jacob.Wharton@wbd-us.com

Attorneys for Defendant Lenovo (United States) Inc.

/s/ Zachariah S. Harrington

Zachariah S. Harrington
Texas Bar No. 24057886
zac@ahtlawfirm.com
Larry D. Thompson, Jr.
Texas Bar No. 24051428
larry@ahtlawfirm.com
Rehan M. Saifullah
Texas Bar No. 24066017
rehan@ahtlawfirm.com
ANTONELLI, HARRINGTON & THOMPSON LLP
4306 Yoakum Blvd., Ste. 450
Houston, TX 77006
(713) 581-3000

Peter D. Siddoway
NC Bar. No. 45647
psiddoway@sagepat.com
SAGE PATENT GROUP
4120 Main at North Hills Street, Suite 230
Raleigh, NC, 27609
(984) 219-3358
Fax: (984) 538-0416

Counsel for Liberty Patents, LLC

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on 8th day of July, 2021, the above document was filed with the Clerk of Court using CM/ECF which will send notification of such filing to the attorneys of record in this case.

/s/ Jacob S. Wharton
Jacob S. Wharton, NCSB No. 37421
WOMBLE BOND DICKINSON (US) LLP
One West 4th Street
Winston-Salem, North Carolina 27101
Telephone: (336) 747-6609
Facsimile: (336) 726-6985
E-mail: Jacob.Wharton@wbd-us.com

Attorney for Defendant Lenovo (United States) Inc.